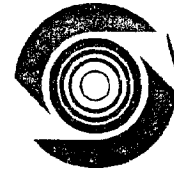


Memorandum



747

DATE : September 13, 1978
TO : J. P. Recchi
FROM : A. A. Mandapat *G.A.h*
SUBJECT : REPORT - STORAGE FACILITIES FOR POLYCHLORINATED
BIPHENYLS (PCBs)

As requested in your memo of August 25, 1978, the following is the information you requested:

1. Our present PCBs storage facility is located as shown on attachment "A". The building is 20' long x 10' wide x 10' high and is constructed of aluminum sheeting with a light steel frame. Access is provided through an 8' high x 8' wide door in the east end closed with an aluminum rolling curtain door. The building rests on a 6" wide concrete foundation poured directly on the asphalt pavement. The floor is the original asphalt yard pavement. At present, the building does not comply with EPA regulations with respect to the floor construction and exterior marking. (See attachment "B")
2. George Deleau's group in Civil Engineering reports that it should cost approximately \$3,000 to provide the containment foundation which would be required to bring the PCBs building into compliance. Construction time would take about two weeks. This estimate is based on the assumption that an outside contractor would do the work.
3. We have contacted Bill Riley, Bob Eaton, Lee Peha and Bob Bishop and we all agree that our present facility:
 - . Does not comply with the EPA regulations as is.
 - . Would comply for PCBs storage up to 30 days with proper exterior marking.
 - . Would comply for PCBs storage in excess of 30 days with a new foundation and floor designed to contain any leaks or spills and proper exterior marking.

J. P. Recchi
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4. It costs us approximately \$1,300 per trip to transport PCBs from Seattle to Murphy, Idaho.

DY:dm

Attachment: Exhibits "A" & "B"

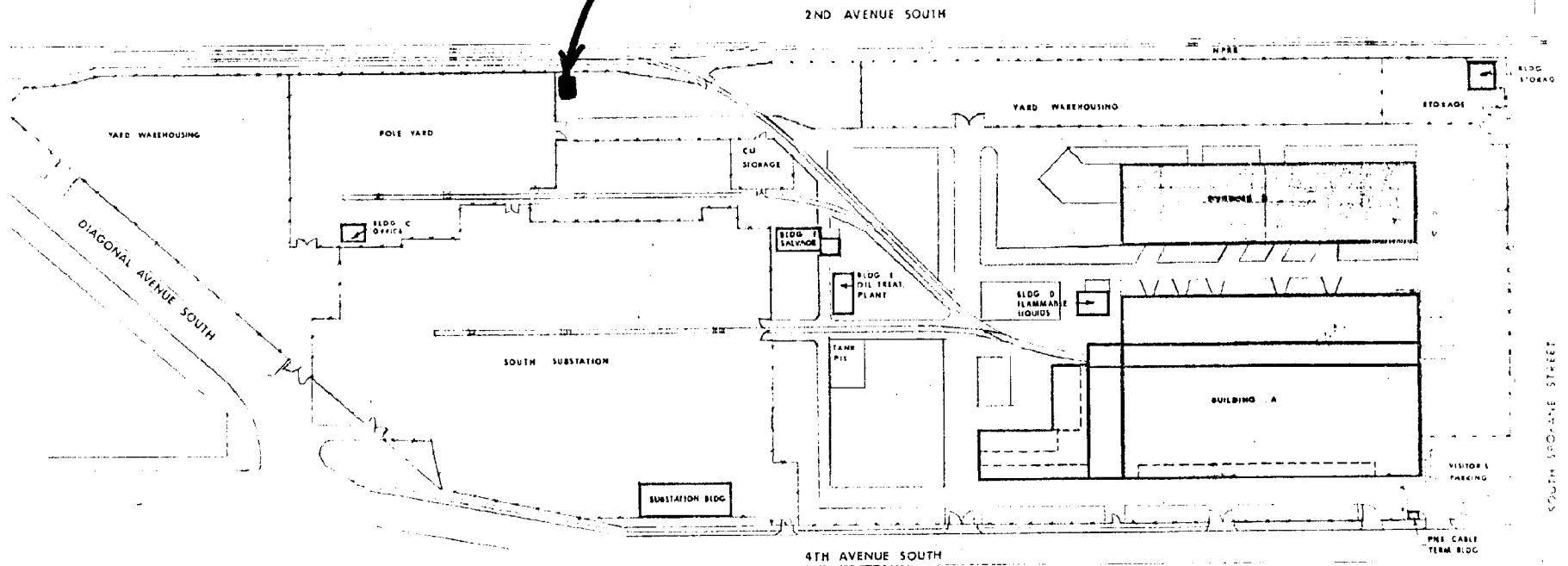
cc: Vickery
Sickler
Sheehan
Henault
Riley
Eaton
G.R. Bishop
Deleau
Peha
Del Young
Tuffs
File

CTY0069518

SEA315931

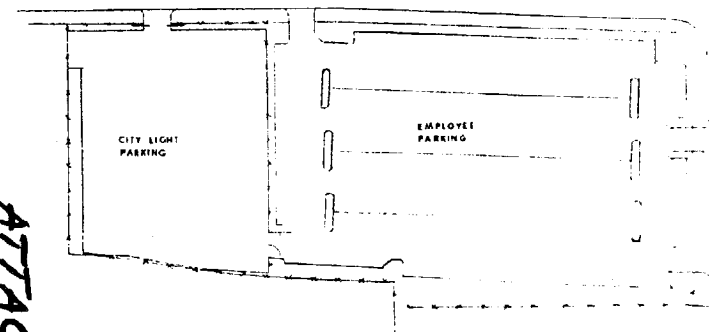


**PCBs
STORAGE**



SOUTH SERVICE CENTER

**ATTACHMENT
"A"**



CTV0069519

SEA315932

recordkeeping, excavation and backfilling, waste segregation burial coordinates, vehicle and equipment movement, use of roadways, leachate collection systems, sampling and monitoring procedures, monitoring wells, and security measures to protect against vandalism and unauthorized waste placements. EPA guidelines entitled "Thermal Processing and Land Disposal of Solid Waste" (39 FR 29337 of August 14, 1974) are a useful reference in preparation of this plan.

(iii) Records shall be maintained for all PCB disposal operations and shall include the three dimensional burial coordinates for PCB's. Additional records shall be developed and maintained as provided in Annex VI.

(8) *Supporting Facilities.* (i) A six foot woven mesh fence, wall, or similar device shall be provided around the site to prevent unauthorized persons and animals from entering.

(ii) Roads shall be maintained to and on the site which are adequate to operate and maintain the site without causing safety or nuisance problems or hazardous conditions.

(iii) The site shall be operated and maintained in a manner to prevent safety problems or hazardous conditions resulting from spilled liquids and windblown materials.

(c) *Approval of chemical waste landfills.* Prior to the disposal of any PCB's in a chemical waste landfill, the owner or operator of the landfill shall receive written approval of the Agency Regional Administrator of the Region in which the landfill is located. Such approval shall be obtained in the following manner:

(1) *Initial report.* The owner or operator shall submit to the Regional Administrator an initial report which contains:

(i) The location of the landfill.
(ii) A detailed description of the landfill including general site plans and design drawings.

(iii) An engineering report describing the manner in which the landfill complies with the requirements for chemical waste landfills in paragraph (b) of this section.

(iv) Sampling and monitoring equipment and facilities available.

(v) Expected waste volumes of PCB's.

(vi) General description of waste materials other than PCB's that are expected to be disposed of in the landfill.

(vii) Landfill operations plan as required in paragraph (b) of this section.

(viii) Any local, State, or Federal permits or approvals.

(ix) Any schedules or plans for complying with the approval requirements of these regulations.

(2) *Other Information.* In addition to the information contained in the report described in subparagraph (1) of this section, the Regional Administrator

may require the owner or operator to submit such other information as the Regional Administrator finds to be reasonably necessary to determine whether a chemical waste landfill should be approved. Such other information shall be restricted to the types of information required in (1)(i) through (1)(ix) above.

(3) *Contents of Approval.* (i) Except as provided in subparagraph (4) of this paragraph the Regional Administrator may not approve a chemical waste landfill for the disposal of PCB's unless he finds that the landfill meets all of the requirements of subparagraph (6) of this paragraph.

(ii) In addition to the requirements of paragraph (b) of this section, the Regional Administrator may include in an approval such other requirements as the Regional Administrator finds are necessary to ensure that operation of the chemical waste landfill does not present an unreasonable risk of injury to health or the environment from PCB's. Such requirements may include a fixed period of time for which the approval is valid.

Such requirements may also include a stipulation that the operator of the chemical waste landfill report to the Regional Administrator any instance of detection of PCB's through any of the monitoring requirements of this section.

(4) *Waivers.* An owner or operator of a chemical waste landfill may submit evidence to the Regional Administrator that operation of the landfill will not present an unreasonable risk of injury to health or the environment from PCB's, where one or more of the requirements of paragraph (b) of this section are not met. On the basis of such evidence and any other available information, the Regional Administrator may in his discretion find that any such requirements are not necessary to protect against such risk and may waive such requirements in any approval for that landfill. Such finding and waiver will be stated in writing and included as part of the approval.

(5) *Persons Approved.* Any approval will designate the persons who own and who are authorized to operate the chemical waste landfill, and will apply only to such persons.

(6) *Final Approval.* Approval of a chemical waste landfill will be in writing and will be signed by the Regional Administrator. The approval will state all requirements applicable to that landfill.

ANNEX III

§ 761.42 Storage for disposal.

(a) Any PCB article or PCB container stored for disposal before January 1, 1983, shall be removed from storage and disposed of as required by this Part before January 1, 1984. Any PCB

article or PCB container stored for disposal after January 1, 1983, shall be removed from storage and disposed of as required by this Part within one year from the date when it was first placed into storage.

(b) Except as provided in paragraph (c) of this section, after July 1, 1978, owners or operators of any facilities used for the storage of PCB's designated for disposal shall comply with the following requirements:

(1) Such facilities shall have:

(i) An adequate roof and walls to prevent rain water from reaching the stored PCB's.

(ii) An adequate floor which has continuous curbing with a minimum six inch high curb. Such floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB article or PCB container stored therein or 25 percent of the total internal volume of all PCB equipment or containers stored therein, whichever is greater.

(iii) No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area.

(iv) Floors and curbing constructed of continuous smooth and impervious materials such as Portland cement concrete or steel to prevent or minimize penetration of PCB chemical substances or mixtures.

(v) No storage facility shall be located at a site which is below the 100-year flood water elevation.

(vi) Non-leaking PCB articles and equipment may be stored temporarily in an area that does not comply with the requirements of paragraph (b) for up to thirty days from the date of removal from service.

(2) Storage of non-leaking and structurally undamaged PCB large high voltage capacitors on pallets next to a storage facility meeting the requirements of paragraph (b) shall be permitted until January 1, 1983. Such storage will be permitted only when the storage facility meeting the requirements of paragraph (b) has immediately available unfilled storage space equal to 10 percent of the volume of capacitors stored outside the facility. These capacitors shall be checked for leaks weekly.

(3) Any storage area subject to the requirements of paragraph (b) or subparagraph (1) of this section shall be marked as required in Subpart C—section 761.20(a)(1)(i)(A).

(4) No item of movable equipment used for handling PCB's in the storage facilities and which actually comes in contact with PCB chemical substances or PCB mixtures shall be removed from the storage facility area unless it has been decontaminated as specified in annex IV.

(5) All PCB containers and articles in storage shall be checked for leaks at